

**FRIEDMAN KAPLAN SEILER & ADELMAN LLP**  
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Andrew W. Goldwater (admission *pro hac vice* pending)  
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*Counsel for Sony Electronics Inc.*

**KUTAK ROCK LLP**  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE: CIRCUIT CITY STORES, INC.,

Case No. 08-35653-KRH

Debtor.

Chapter 11

**MOTION PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2)  
FOR ADMISSION *PRO HAC VICE***

Peter J. Barrett (“Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and a partner with Kutak Rock LLP, hereby moves the Court, pursuant to this motion (the “Motion”), for the entry of an order, substantially in the form of Exhibit A, authorizing Andrew W. Goldwater (“Mr. Goldwater”), a partner in the law firm of Friedman Kaplan Seiler & Adelman LLP, 7 Times Square, New York, New York 10036-6516, to appear and practice *pro hac vice* on behalf of Sony Electronics Inc. (“Sony”) in the above-captioned chapter 11 cases now pending in the United States Bankruptcy Court for the Eastern District of Virginia and any related adversary litigation pursuant to Rule 2090-1(E)(2) of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Bankruptcy Rules”). In support of this Motion, Movant states as follows:

1. Mr. Goldwater is admitted, practicing and in good standing as a member of the bar of the State of New York. He is admitted to practice before the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York and the United States District Court for the Northern District of New York. Mr. Goldwater has been practicing law since 1981. There are no disciplinary proceedings pending against Mr. Goldwater.

2. Pursuant to Local Bankruptcy Rule 2090-1(E)(2), "an attorney from another state, the District of Columbia or a territory of the United States may appear and practice in cases *pro hac vice* before this Court upon motion of a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar."

3. Movant requests the Court to allow Mr. Goldwater to file pleadings and to appear at hearings in these chapter 11 cases.

4. Movant requests the Court to treat this Motion as a written memorandum of points and authorities or waive any requirement that this Motion be accompanied by a written memorandum of points and authorities as described in Rule 9013-1(G) of the Local Bankruptcy Rules.

5. Movant has provided notice of this Motion to all persons receiving electronic notice in these bankruptcy cases.

6. An Application pursuant to Local Bankruptcy Rule 2090-1(E)(2)(a) is attached hereto as Exhibit B.

WHEREFORE, for the reasons set forth herein, Movant respectfully requests that the Court enter an order, substantially in the form attached hereto as Exhibit A, (a) authorizing Mr. Goldwater to appear and practice *pro hac vice* on behalf of Sony Electronics Inc.; and (b)

granting such other and further relief as is just and proper.

Dated: January 23, 2014

**SONY ELECTRONICS INC.**

By: /s/ Peter J. Barrett \_\_\_\_\_

**KUTAK ROCK LLP**

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and

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*Counsel for Sony Electronics Inc.*

**EXHIBIT A**

**FRIEDMAN KAPLAN SEILER & ADELMAN LLP**  
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Andrew W. Goldwater (admission *pro hac vice* pending)  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

IN RE: CIRCUIT CITY STORES, INC.,

Debtor.

Case No. 08-35653-KRH  
Chapter 11

**ORDER GRANTING MOTION PURSUANT TO LOCAL BANKRUPTCY RULE  
2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

Upon the motion (the “Motion”)<sup>1</sup> of Peter J. Barrett of Kutak Rock LLP for the admission *pro hac vice* of Andrew W. Goldwater, a partner in the law firm of Friedman Kaplan Seiler & Adelman LLP, 7 Times Square, New York, New York 10036-6516; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); venue being proper before this court pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED

1. The Motion is granted in its entirety.
2. Andrew W. Goldwater is authorized to appear and practice *pro hac vice* as counsel for Sony Electronics Inc., in the above-captioned chapter 11 cases and all related

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Motion.

adversary proceedings.

3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Richmond, Virginia

Dated: \_\_\_\_\_

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United States Bankruptcy Court Judge

We ask for this:

/s/

**KUTAK ROCK LLP**

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and

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*Counsel for Sony Electronics Inc.*

**EXHIBIT B**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER  
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653 , \* Case Name Circuit City Stores, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) Andrew William Goldwater  
Bar Identification Number 1891142 State NY  
Firm Name Friedman Kaplan Seiler & Adelman LLP  
Firm Phone # (212) 833-1100 Direct Dial # (212) 833-1106 FAX # (212) 373-7906  
E-Mail Address agoldwater@fklaw.com  
Office Mailing Address 7 Times Square, New York, NY 10036-6516  
Name(s) of federal court(s) in which I have been admitted EDNY, SDNY, NDNY

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

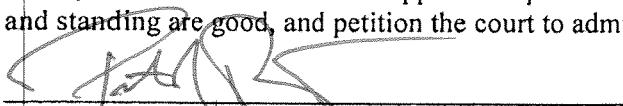
I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.



(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.



(Signature)



(Date)

Peter J. Barrett

(Typed or Printed Name)

\**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

Court Use Only:

The motion for admission is GRANTED \_\_\_\_\_ or DENIED \_\_\_\_\_

(Judge's Signature)

(Date)